

Benjamin P. Deutsch (BD-5435)  
SCHNADER HARRISON SEGAL & LEWIS LLP  
140 Broadway, Suite 3100  
New York, New York 10005-1101  
(212) 973-8000  
(212) 972-8798 (fax)  
*Attorneys for Plaintiff*

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

GRACIANO CORPORATION,  
  
Plaintiff,

v.

JOHN P. PICONE, INC., and  
JAMES McCULLAGH CO., INC., trading/doing  
business as PICONE/McCULLAGH  
JOINT VENTURE, FEDERAL INSURANCE  
COMPANY, and LIBERTY MUTUAL  
INSURANCE COMPANY,  
  
Defendants.

Civil Action No.: 08-CV-6907 (JFK)

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**


PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Benjamin P. Deutsch, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Michael G. Bock, Esquire  
Schnader Harrison Segal & Lewis LLP  
120 Fifth Avenue, Suite 2700  
Pittsburgh, PA 15222-3001  
Phone: 412-577-5200  
Facsimile: 412-765-3858

MICHAEL G. BOCK is a member in good standing of the Bar of the State of Pennsylvania. There are no pending disciplinary proceedings against Mr. Bock in any State or Federal Court.

Dated: New York, New York  
August 11, 2008

SCHNADER HARRISON SEGAL &  
LEWIS LLP

By:   
Benjamin P. Deutsch (BD-5435)  
140 Broadway, Suite 3100  
New York, New York 10005  
(212) 973-8000  
(212) 972-8798 (fax)  
*Attorneys for Plaintiff*

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X  
:  
GRACIANO CORPORATION, :  
:  
Plaintiff, :  
:  
v. : Civil Action No.: 08-CV-6907 (JFK)  
:  
JOHN P. PICONE, INC., and :  
JAMES McCULLAGH CO., INC., trading/doing :  
business as PICONE/McCULLAGH :  
JOINT VENTURE, FEDERAL INSURANCE :  
COMPANY, and LIBERTY MUTUAL :  
INSURANCE COMPANY, :  
:  
Defendants. :  
-----X

**AFFIDAVIT OF BENJAMIN P.  
DEUTSCH IN SUPPORT OF  
MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

State of New York )  
)ss:  
County of New York )

Benjamin P. Deutsch, being duly sworn, hereby deposes and says as follows:

1. I am a partner at Schnader Harrison Segal & Lewis LLP, counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Michael G. Bock as counsel *pro hac vice* to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1996. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Mr. Bock for approximately two (2) years.
4. Mr. Bock is a partner at Schnader Harrison Segal & Lewis LLP in Pittsburgh, Pennsylvania.

5. I have found Mr. Bock to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.
6. Accordingly, I am pleased to move the admission of Michael G. Bock, *pro hac vice*.
7. I respectfully submit a proposed order granting the admission of Michael G. Bock, *pro hac vice*, which is attached hereto as Exhibit A.

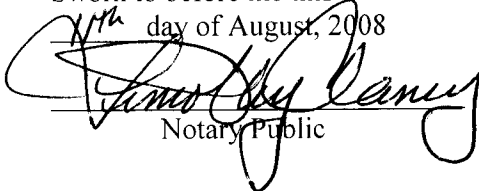
WHEREFORE, it is respectfully requested that the motion to admit Michael G. Bock, *pro hac vice*, to represent Plaintiff in the above captioned matter, be granted.

Respectfully Submitted,



Benjamin P. Deutsch, Esquire (BD-5435)

Sworn to before me this  
11<sup>th</sup> day of August, 2008



Notary Public

TIMOTHY CLANCY  
NOTARY PUBLIC State of New York  
No. 0015021469  
Qualified in New York County  
Commission Expires Dec. 13, 2011



Supreme Court of Pennsylvania

**CERTIFICATE OF GOOD STANDING**

***Michael G. Bock, Esq.***

**DATE OF ADMISSION**

***November 27, 1991***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal**

**Dated: August 4, 2008**

A handwritten signature in cursive script, reading "Patricia A. Nicola", written over a horizontal line.

Patricia A. Nicola

Chief Clerk

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X  
GRACIANO CORPORATION,

Plaintiff,

v.

JOHN P. PICONE, INC., and  
JAMES McCULLAGH CO., INC., trading/doing  
business as PICONE/McCULLAGH  
JOINT VENTURE, FEDERAL INSURANCE  
COMPANY, and LIBERTY MUTUAL  
INSURANCE COMPANY,

Defendants.  
-----X

Civil Action No.: 08-CV-6907 (JFK)

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of Benjamin P. Deutsch, attorney for Plaintiff, Graciano Corporation,  
and Mr. Deutsch's affidavit in support;

IT IS HEREBY ORDERED that

Michael G. Bock, Esquire  
Schnader Harrison Segal & Lewis LLP  
120 Fifth Avenue, Suite 2700  
Pittsburgh, PA 15222-3001  
Phone: 412-577-5200  
Facsimile: 412-765-3858  
mbock@schnader.com

is admitted to practice *pro hac vice* as counsel for Plaintiff, Graciano Corporation, in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: New York, New York  
August \_\_, 2008

\_\_\_\_\_  
United States District Judge

**AFFIDAVIT OF SERVICE**

STATE OF NEW YORK       )  
  ) ss.:  
COUNTY OF NEW YORK    )

Timothy Clancy, being duly sworn, deposes and says, deponent is not a party to this action, is over eighteen (18) years of age and resides in Monmouth County, New Jersey.

On August 11, 2008, I served a true copy of the attached MOTION TO ADMIT COUNSEL PRO HAC VICE, with accompanying documents, upon:

John P. Picone, Inc.  
31 Garden Lane, Box 9013  
Lawrence, New York 11559-9013

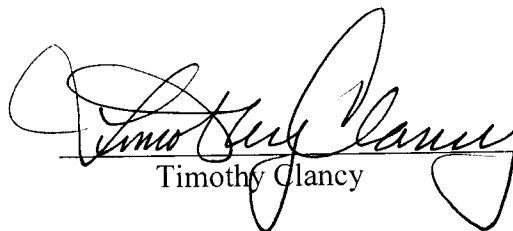
Picone/McCullagh Joint Venture  
31 Garden Lane  
Lawrence, New York 11559

James McCullagh Co., Inc.  
75 E. Bethpage Road, Box 6011  
Plainview, New York 11803-0611

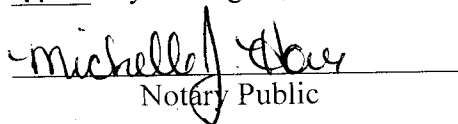
Federal Insurance Company  
15 Mountain View Road  
Warren, New Jersey 07061

Liberty Mutual Insurance Company  
175 Berkeley Street  
Boston, Massachusetts 02116

by First Class Mail.

  
Timothy Clancy

Sworn to before me this  
11th day of August, 2008

  
Notary Public

**MICHELLE J. HOVE**  
Notary Public, State of New York  
No. 01HO6125278  
Qualified in Nassau County  
Commission Expires April 11, 20 09